

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA) No. 1:19-cr-57 (LO)
)
 v.) Conspiracy to Distribute Cocaine and
) other Controlled Substances
 SPENCER PAK,) 21 U.S.C. § 846
)
 Defendant.)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Beginning in or about 2010, and continuing thereafter up to and including May 9, 2019, the exact dates being unknown to the United States, in the Eastern District of Virginia and elsewhere, the defendant, SPENCER PAK (a/k/a Pakstacks) did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with other persons, both known and unknown to the United States, to commit the following offenses:

- (1) to unlawfully, knowingly, and intentionally distribute five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b);
- (2) to unlawfully, knowingly, and intentionally distribute one hundred kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b);

(3) to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of tetrahydrocannabinol (THC), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1);

(4) to unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using controlled substances, in violation of Title 21, United States Code, Section 856;

(5) to unlawfully, knowingly, and intentionally distribute controlled substances to persons under the age of twenty-one, in violation of Title 21, United States Code, Section 859;

(6) to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to violate the provisions of Title 21 of the United States Code, including Title 21, United States Code, Sections 841, 856, 859, and 860; and to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to assist in avoiding detection for any such offense, all in violation of Title 21, United States Code, Section 861; and

(7) to unlawfully, knowingly, and intentionally sell drug paraphernalia and to use the mails and other facilities of interstate commerce to transport drug paraphernalia, that is, devices for use in compounding, converting, concealing, producing, processing, preparing, ingesting, inhaling, or otherwise introducing into the human body unlawful controlled substances, including THC and

marijuana and products derived from marijuana, in violation of Title 21, United States Code, Section 863.

All in violation of Title 21, United States Code, Section 846

Forfeiture

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

The defendant, SPENCER PAK, if convicted of the offense charged in this Criminal Information, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation and any of the defendant's property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

Pursuant to Title 21, United States Code, Section 853(a)

G. Zachary Terwilliger
United States Attorney

By:

James L. Trump
Carina A. Cuellar
Assistant United States Attorneys